

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DEONTRA SPENCE,	)	
	)	
Plaintiff,	)	Case No. 15 CV 5987
	)	
v.	)	Judge Amy St. Eve
	)	
CITY OF CHICAGO, et al.,	)	
	)	
Defendants.	)	

**OFFER OF JUDGMENT**

Defendants, City of Chicago and Chicago police officer Roy Beard Jr., by their undersigned attorneys, make the following offer of judgment to Plaintiff, Deontra Spence, pursuant to Fed.R.Civ.P. 68.

1. Defendants, City of Chicago and Roy Beard Jr., offer to allow judgment to be taken against them collectively and in favor of Plaintiff Deontra Spence in the total amount of ONE HUNDRED TWENTY THOUSAND AND NO/100 (\$120,000.00) DOLLARS, plus reasonable attorneys' fees and costs accrued through the date that the offer is tendered, June 20, 2016.

2. This offer of judgment is inclusive of all claims Plaintiff has or may have, against Defendants, City of Chicago, and Roy Beard Jr., and any and all other current or former employees or agents of the City of Chicago arising from the incident or injuries alleged in Plaintiff's complaint or any amendment thereof. Nothing in this offer of judgment shall be construed as an admission of liability by any Defendant.

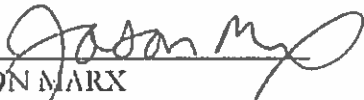
3. This offer of judgment is conditioned upon Plaintiff accepting the offer of judgment as to each of the Defendants, City of Chicago and Roy Beard Jr.. Acceptance of this offer of

judgment by Plaintiff against fewer than all of Defendants, City of Chicago and Roy Beard Jr., shall be deemed a rejection of this offer.

4. Pursuant to Fed.R.Civ.P. 68, an offer not accepted within fourteen (14) days after service of the offer shall be deemed withdrawn and evidence thereof is not admissible except in a proceeding to determine costs.

DATED: June 20, 2016.

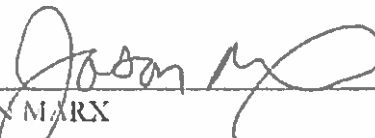
Respectfully submitted,

/s/   
JASON MARX  
Assistant Corporation Counsel  
City of Chicago, Law Dept.  
30 N. LaSalle, Suite 900  
Chicago, IL 60602  
312-744-1975  
Atty No. 6279266

CERTIFICATE OF SERVICE

I hereby certify that I have caused a true and correct copy of the above document to be delivered via hand delivery and via email to the following party on June 20, 2016:

Ronak Maisuria, Esq.  
Erickson & Oppenheimer  
223 W. Jackson Blvd., Suite 200  
Chicago, IL 60606  
Ronak@colawus.com

/s/   
JASON MARX

**Ronak Maisuria**

---

**From:** Marx, Jason <Jason.Marx@cityofchicago.org>  
**Sent:** Tuesday, June 21, 2016 3:28 PM  
**To:** Ronak Maisuria  
**Cc:** Michael Oppenheimer; Jon Neuleib; Jon Erickson; Fronczak, Caroline; kbattle@hoblawfirm.com; wmonu@hoblawfirm.com  
**Subject:** RE: Deontra Spence v. City of Chicago, et al., 15 C 5987, Offer of Judgment attached

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Flagged

Since you are accepting, we ask that you file it on the docket.  
Also, please send us your attorney fee demand and the documentation supporting your demand.

Thank you,  
Jason Marx  
Assistant Corporation Counsel  
30 N. LaSalle Street, Suite 900  
Chicago, IL 60602  
(312) 744-1975

---

**From:** Ronak Maisuria [mailto:Ronak@eolawus.com]  
**Sent:** Tuesday, June 21, 2016 2:59 PM  
**To:** Marx, Jason  
**Cc:** Michael Oppenheimer; Jon Neuleib; Jon Erickson; battle@hoblaw.com; Fronczak, Caroline; wmonu@hoblawfirm.com  
**Subject:** RE: Deontra Spence v. City of Chicago, et al., 15 C 5987, Offer of Judgment attached

Please note that Plaintiff accepts Defendants' offer of judgment. Will you take care of filing this on the docket?

Ronak Maisuria  
Erickson & Oppenheimer, Ltd.  
223 W. Jackson Blvd., Ste. 200  
Chicago, Illinois 60606  
Phone: 312-327-3370  
Fax: 773-409-5827

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**From:** Marx, Jason [<mailto:Jason.Marx@cityofchicago.org>]  
**Sent:** Monday, June 20, 2016 10:05 AM  
**To:** Ronak Maisuria <[Ronak@eolawus.com](mailto:Ronak@eolawus.com)>  
**Cc:** Michael Oppenheimer <[michael@eolawus.com](mailto:michael@eolawus.com)>; Jon Neuleib <[JonN@eolawus.com](mailto:JonN@eolawus.com)>; Jon Erickson <[Jon@eolawus.com](mailto:Jon@eolawus.com)>; [battle@hoblaw.com](mailto:battle@hoblaw.com); Fronczak, Caroline <[Caroline.Fronczak@cityofchicago.org](mailto:Caroline.Fronczak@cityofchicago.org)>; [wmonu@hoblawfirm.com](mailto:wmonu@hoblawfirm.com)  
**Subject:** RE: Deontra Spence v. City of Chicago, et al., 15 C 5987, Offer of Judgment attached

Yes.

Jason Marx  
Assistant Corporation Counsel  
30 N. LaSalle Street, Suite 900  
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(312) 744-1975

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**From:** Ronak Maisuria [<mailto:Ronak@eolawus.com>]  
**Sent:** Monday, June 20, 2016 10:04 AM  
**To:** Marx, Jason  
**Cc:** Michael Oppenheimer; Jon Neuleib; Jon Erickson; [battle@hoblaw.com](mailto:battle@hoblaw.com); Fronczak, Caroline; [wmonu@hoblawfirm.com](mailto:wmonu@hoblawfirm.com)  
**Subject:** RE: Deontra Spence v. City of Chicago, et al., 15 C 5987, Offer of Judgment attached

Thanks. Has this been approved by the Finance Committee?

Ronak Maisuria  
Erickson & Oppenheimer, Ltd.  
223 W. Jackson Blvd., Ste. 200  
Chicago, Illinois 60606  
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Fax: 773-409-5827

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**From:** Marx, Jason [<mailto:Jason.Marx@cityofchicago.org>]  
**Sent:** Monday, June 20, 2016 10:01 AM  
**To:** Ronak Maisuria <[Ronak@eolawus.com](mailto:Ronak@eolawus.com)>  
**Cc:** Michael Oppenheimer <[michael@eolawus.com](mailto:michael@eolawus.com)>; Jon Neuleib <[JonN@eolawus.com](mailto:JonN@eolawus.com)>; Jon Erickson <[Jon@eolawus.com](mailto:Jon@eolawus.com)>; [battle@hoblaw.com](mailto:battle@hoblaw.com); Fronczak, Caroline <[Caroline.Fronczak@cityofchicago.org](mailto:Caroline.Fronczak@cityofchicago.org)>; [wmonu@hoblawfirm.com](mailto:wmonu@hoblawfirm.com)  
**Subject:** Deontra Spence v. City of Chicago, et al., 15 C 5987, Offer of Judgment attached

Hi Counsel,

Offer of Judgment is attached.

Thank you,  
Jason Marx  
Assistant Corporation Counsel  
30 N. LaSalle Street, Suite 900  
Chicago, IL 60602  
(312) 744-1975

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